

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

GOOGLE INC.

PLAINTIFF

V.

CIVIL ACTION NO. 3:14-CV-981-HTW-LRA

JIM HOOD, in his official capacity
as Attorney General of the State of
Mississippi

DEFENDANT

DEFENDANT'S NOTICE OF 30(b)(1) DEPOSITION OF SHEILY CHHABRIA

To: Google Inc., by and through its attorneys of record, Fred Krutz and Daniel J. Mulholland, FORMAN WATKINS KRUTZ & TARDY LLP, 200 South Lamar Street, Suite 100, Jackson, Mississippi 39201; David H. Kramer, WISON, SONNINI, GOODRICH & ROSATI, PC, 650 Page Mill Road, Palo Alto, California 94304; Jamie Gorelick, Patrick Carome, Paul Lekas, and Blake Roberts, WILMER CUTLER PICKERING HALE AND DOOR LLP, 1875 Pennsylvania Ave. NW, Washington, DC 20006; and Peter Neiman & Violetta Watson, WILMER CUTLER PICKERING HALE AND DOOR LLP, 7 World Trade Center, 250 Greenwich Street, New York, NY 10007.

PLEASE TAKE NOTICE that Defendant shall take the deposition upon oral examination of Sheily Chhabria. This deposition will be taken pursuant to Federal Rules of Civil Procedure ("F.R.C.P."), Rule 30(b)(1), and will be recorded by stenographic and/or sound and visual means before an officer authorized by law to administer oaths. The deposition will take place on at a date, time and location set forth below or at another mutually agreed-upon date, time and location and shall continue from day-to-day until completed.

DEPONENT: Sheily Chhabria

DATE: September 14, 2015

TIME: 9:00 a.m. CDT

LOCATION: FORMAN WATKINS KRUTZ & TARDY LLP, 200 South Lamar Street, Suite 100, Jackson, Mississippi 39201

The examining Party gives express prior notice that any objections to the scope of this

examination are deemed waived if relief from the Court is not granted. The examining Party is prepared to meet and confer concerning the scope of this examination, but absent an agreement to the contrary, the examining Party intends to proceed without objection as to the scope unless ordered otherwise by the Court.

DOCUMENT REQUEST

1. All documents relied upon or reviewed when preparing your declaration in this case, or which form the basis of your knowledge in your declaration.

THIS the 17th day of August, 2015.

Respectfully Submitted,

JIM HOOD, in his official capacity as Attorney General of the State of Mississippi

By: /s/ John W. Kitchens

John W. Kitchens, (MSB # 101137)
Kitchens Law Firm, P.A.
Post Office Box 799
Crystal Springs, MS 39059-0799
Telephone: 601-892-3067
Facsimile: 601-892-3057
jkitchens@kitchenslaw.net

DOUGLAS T. MIRACLE (MSB # 9648)
SPECIAL ASSISTANT ATTORNEY GENERAL
BRIDGETTE W. WIGGINS (MSB # 9676)
SPECIAL ASSISTANT ATTORNEY GENERAL
KRISSY CASEY NOBILE (MSB # 103577)
SPECIAL ASSISTANT ATTORNEY GENERAL
ALLISON O'NEAL MCMINN
SPECIAL ASSISTANT ATTORNEY GENERAL
Office of the Attorney General
Post Office Box 220
Jackson, Mississippi 39205-0220
Telephone: (601) 359-5654
Facsimile: (601) 359-2003
dmira@ago.state.ms.us
usbwill@ago.state.ms.us
knobi@ago.state.ms.us

bwill@ago.state.ms.us
aoneal@ago.state.ms.us

F. Jerome Tapley, PHV
Hirlye R. "Ryan" Lutz III, PHV
Cory Watson, P.C.
2131 Magnolia Avenue South
Birmingham, AL 35205
Telephone: (205) 328-2200
jtapley@corywatson.com
rlutz@corywatson.com

Sean Rommel, PHV
Jim Wyly, PHV
Wyly-Rommel, PLLC
4004 Texas Boulevard
Texarkana, Texas 75503
Telephone: (903) 334-8646
Facsimile: (903) 334-8645
srommel@wylyrommel.com
jwyly@wylyrommel.com

Carolyn G. Anderson, PHV
ZIMMERMAN REED, PLLP
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Telephone: 612.341.0400
carolyn.anderson@zimmreed.com

CERTIFICATE OF SERVICE

I, John W. Kitchens, one of the attorneys for Defendant Jim Hood, hereby certify that a true and correct copy of the foregoing has been served via electronic mail and United States Mail on the following:

Fred Krutz , III, Esq.
Daniel J. Mulholland, Esq.
FORMAN, PERRY, WATKINS, KRUTZ & TARDY, LLP
P.O. Box 22608
200 S. Lamar Street, Suite 100 (39201-4099)
Jackson, MS 39225-2608
Email: mulhollanddj@fpwk.com
Email: fred@fpwk.com

David H. Kramer, PHV
WILSON, SONSINI, GOODRICH & ROSATI, PC
650 Page Mill Road
Palo Alto, CA 94304-1050
Email: dkramer@wsgr.com

Blake C. Roberts, PHV
WILMER, CUTLER, PICKERING, HALE & DORR, LLP
1801 Pennsylvania Avenue, NW
Washington, DC 20006
Email: blake.roberts@wilmerhale.com

Jamie S. Gorelick, PHV
WILMER, CUTLER, PICKERING, HALE & DORR, LLP
1801 Pennsylvania Avenue, NW
Washington, DC 20006
Email: jamie.gorelick@wilmerhale.com

Patrick J. Carome, PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Email: patrick.carome@wilmerhale.com

Peter Neiman, PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Email: peter.neiman@wilmerhale.com

Violetta G. Watson, PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Email: violetta.watson@wilmerhale.com

Andrew L. Deutsch, PHV
DLA PIPER LLP
1251 Avenue of Americas
New York, NY 10020-1104
Email: andrew.deutsch@dlapiper.com

C. Michael Ellingburg, Esq.
Brooke M. Trusty, Esq.
Daniel Coker Horton & Bell
Post Office Box 1084
Jackson, MS 39215
Email: mellingburg@danielcoker.com
Email: btrusty@danielcoker.com

Chris Johnstone, PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP
950 Page Mill Road
Palo Alto, CA 94304
Email: chris.johnstone@wilmerhale.com

Christopher Bouchoux, PHV
WILMER, CUTLER, PICKERING, HALE AND DORR, LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
Email: christopher.bouchoux@wilmerhale.com

Corynne McSherry, PHV
Electronic Frontier Foundation
815 Eddy Street
San Francisco CA 94109 USA
Email: corynne@eff.org

Eli J. Kay-Oliphant, PHV
MASSEY GAIL
50 East Washington Street, Ste 400
Chicago, IL 60602
Email: ekay-oliphant@masseygail.com

Herbert W. Wilson II, Esq.
Attorney at Law
Post Office Box 6031
Gulfport, MS 39506
Email: herb@gulfcoastlawyers.ms

Jason R. Bush, Esq.
BAKER DONELSON BEARMAN CLADWELL & BERKOWITZ, PC
4268 I-55 North
Jackson, MS 39211
Email: jbush@bakerdonelson.com

Jonathan S. Massey, PHV
1325 G Street, NW, Ste 500
Washington, DC 20025
Email: jmassey@masseygail.com

Laura S. Crittenden, PHV
Attorney at Law
688 Mt. Vernon Drive
Lexington, KY 40502
Laura.crittenden@ky.gov

Michael J. Bentley, Esq.
BRADLEY AVANT BOULT & CUMMONS
One Jackson Place, Ste 400
Jackson, MS 39201
Mbentley@babc.com

Paul D. Clement, PHV
BANCROFT PLLC
1919 M Street, NW, Ste 470
Washington, DC 20036
Email: pclement@bancroftpllc.com

Jeffrey M Harris, PHV
BANCROFT PLLC
1919 M Street, NW, Ste 470
Washington, DC 20036
Email: jharris@bancroftpllc.com

R. David Kaufman, Esq.
Brunini Law
The Pinnacle Building, Ste 100
190 East Capitol Street
Jackson, MS 39201
Email: dkaufman@bruini.com

Robert S. Schwartz, PHV
CONSTANTINE CANNON
335 Madison Avenue, 9th Floor
New York, NY 10017
Email: rschwartz@constantinecannon.com

Seth D. Greenstein, PHV
CONSTANTINE CANNON
1001 Pennsylvania Avenue, NW, Ste 1300N
Washington, DC 20004
Email: sgreenstein@constantinecannon.com

Viet D. Dinh, PHV
BANCROFT PLLC
1919 M Street, NW, Ste 470
Washington, DC 20036
Email: vdinh@bancroftpllc.com

THIS the 17th Day of June, 2015.

/s/ John W. Kitchens
John W. Kitchens

John W. Kitchens, (MSB # 101137)
Kitchens Law Firm, P.A.
Post Office Box 799
Crystal Springs, MS 39059-0799
Telephone: 601-892-3067
Facsimile: 601-892-3057
jkitchens@kitchenslaw.net

DOUGLAS T. MIRACLE (MSB # 9648)
SPECIAL ASSISTANT ATTORNEY GENERAL
BRIDGETTE W. WIGGINS (MSB # 9676)
SPECIAL ASSISTANT ATTORNEY GENERAL
KRISSY CASEY NOBILE (MSB # 103577)
SPECIAL ASSISTANT ATTORNEY GENERAL
ALLISON O'NEAL MCMINN
SPECIAL ASSISTANT ATTORNEY GENERAL
Office of the Attorney General
Post Office Box 220

Jackson, Mississippi 39205-0220
Telephone: (601) 359-5654
Facsimile: (601) 359-2003
dmira@ago.state.ms.us
knobi@ago.state.ms.us
bwill@ago.state.ms.us
aoneal@ago.state.ms.us

F. Jerome Tapley, PHV
Hirlye R. "Ryan" Lutz III, PHV
Cory Watson, P.C.
2131 Magnolia Avenue South
Birmingham, AL 35205
Telephone: (205) 328-2200
jtapley@corywatson.com
rlutz@corywatson.com

Sean Rommel, PHV
Jim Wyly, PHV
Wyly-Rommel, PLLC
4004 Texas Boulevard
Texarkana, Texas 75503
Telephone: (903) 334-8646
Facsimile: (903) 334-8645
srommel@wylyrommel.com
jwyly@wylyrommel.com

Carolyn G. Anderson, PHV
ZIMMERMAN REED, PLLP
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Telephone: 612.341.0400
carolyn.anderson@zimmreed.com